

EXHIBIT 28

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; et al.,

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, OPERATING AS
AMERICORPS; et al.,

Defendants.

C.A. No. 1:25-cv-01363-DLB

DECLARATION OF ROWENA MADDEN

Pursuant to 28 U.S.C. § 1746, I, Rowena Madden, hereby declare as follows:

1. I am a resident of the State of New Jersey. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the New Jersey Department of State as the Director of the Governor's Office of Volunteerism and the Executive Director of the New Jersey Commission on National and Community Service ("NJCNCs").

3. The Governor's Office of Volunteerism supports New Jersey's 1.9 million volunteers with training and recognition while matching community needs in partnership with volunteer centers, disaster response organizations, business volunteers, schools, colleges, faith-based organizations and community organizations.

4. The NJCNCS supports the growth and development of national service and volunteerism throughout New Jersey through the promotion, coordination and enhancement of citizen participation. NJCNCS serves as a liaison between public, private, local, state and national volunteer and community service programs.

A. The New Jersey Commission on National and Community Service

5. Part of the Governor's Office of Volunteerism, the NJCNCS administers New Jersey's AmeriCorps program and is responsible for managing funds received from AmeriCorps National ("AmeriCorps"). As Executive Director of the NJCNCS, I am responsible for overseeing the federal grants received by the New Jersey Department of State from AmeriCorps in coordination with the Department of State, Division of Administration.

6. NJCNCS receives and manages grant awards directly from AmeriCorps (known as "prime" grants), awards and disburses subgrants from the prime grants, monitors subgrantees for performance and compliance with grant requirements, provides training and technical assistance for subgrantees, and functions as a liaison between AmeriCorps and subgrantees. NJCNCS manages two separate types of grants involving AmeriCorps—competitive funds and formula funds.

7. For National competitive funding, NJCNCS typically issues an AmeriCorps Competitive Notice of Funding Opportunity, which is based on a corresponding federal Notice of Funding Opportunity issued by AmeriCorps. Grant applicants submit application materials to NJCNCS in response to the notice, and NJCNCS then selects applications for national submission. AmeriCorps exercises its discretion in approving grant applications. NJDOS then administers these Federal grants once awarded.

8. NJCNCS is also the prime recipient for the State Commission Formula Funds, a Congressionally appropriated program. In a typical fiscal year, NJCNCS receives approximately \$6 million in Formula Funding. NJCNCS awards these funds to subgrantees through a state-based competitive process. Currently, NJCNCS manages grants for 23 subgrantees through its Formula Funding. Subgrantees use the funds they receive from NJCNCS to run programs to benefit New Jersey residents that focus on education, healthy futures, economic opportunity, and environmental stewardship. The money is used to recruit, manage, pay, and train AmeriCorps members and handle program operations and costs, monitor and support host sites to ensure compliant and effective service. Many subgrantees then post AmeriCorps members at partner organizations called host sites. The host sites typically provide service sites for members and supervise regular service, and verify hours and performance measures.

9. For example, the AmeriCorps New Jersey Watershed Ambassadors Program is administered by the New Jersey Department of Environmental Protection (“NJDEP”), a state agency, using formula funds. Each year, the program assigns individual AmeriCorps members to New Jersey’s 20 watershed management areas to serve as “Watershed Ambassadors” to their watershed communities. The Watershed Ambassadors promote watershed stewardship through education and direct community involvement and monitor stream health through performing visual and biological assessments. The program works with all sectors of society to improve the quality of New Jersey’s waterways, nurturing community-based environmental activities and empowering residents to make responsible and informed decisions regarding their watershed. Since its inception in 2000, approximately 470 members have participated in the program. The Watershed Ambassadors Program also selects 3 full-time Source Water Protection Ambassadors who are each

assigned to a region of the State to conduct education and stewardship projects related to sources of drinking water.

10. Within the focus area of Healthy Futures, NJCNCS funds several programs, including the Recovery Corps, which is run by The Center for Family Services in Camden, NJ, Jewish Renaissance Foundation in Perth Amboy, NJ, and Zufall Health Center in Morris County, NJ. Together, our Healthy Futures programs served 51,190 individuals. Zufall's 10 AmeriCorps members provide low-income adults and children in Morris County and surrounding counties with medical, dental, nutritional, pre-natal and diabetes services. In this grant year period they have already served 809 children and adults, working with pregnant patients during pre-screening and enrollment – instructing about pre-natal and post-natal care, and working with 1,064 children and youth experiencing obesity to provide nutrition and exercise education. One AmeriCorps member has screened diabetic patients for retinopathy, and others have worked with 71 veterans to obtain long overdue dental services. This special program recruits AmeriCorps members with college backgrounds in biology, psychology, neuroscience, and pre-med courses, and many are planning careers as physicians and nurse practitioners, psychologists, dentists, and public health workers. This is a very valued AmeriCorps program, which provides care to underserved children and adults.

11. NJCNCS also administers the NJ Foster Grandparent Program and Volunteer Generation Fund. The NJ Foster Grandparent Program uses grant funds from AmeriCorps, which focuses on school readiness and K-12 education and provides one-on-one mentoring and academic support to children with special or exceptional needs. In 2023, Foster Grandparents in New Jersey served more than 720 young people with special needs. In a typical funding year, NJCNCS receives approximately \$900,000 to fund the Foster Grandparent Program. The Volunteer

Generation Fund (“VGF”), “Jersey Strong: I am a Volunteer,” is a program designed to strengthen the State’s ability to engage more citizens in meaningful volunteer service and build capacity of volunteer agencies. To date this program and its 11 subgrantees, has completed 367 training and technical assistance outreach sessions, has recruited 10,360 volunteers offered services to 6,326 at-risk youth, and 4,509 senior citizens. In a typical funding year, NJCNCS receives approximately \$579,360 for the Volunteer Generation Fund. In a typical funding year, NJCNCS receives approximately \$579,360 for the Volunteer Generation Fund.

12. To administer New Jersey’s AmeriCorps programs, NJCNCS receives two administrative grants: a Commission Support grant and a Commission Investment Fund grant. In a typical year, NJCNCS receives approximately \$440,000 for Commission Support and \$166,000 for Commission Investment. NJCNCS uses these funds to provide training for AmeriCorps subgrantees and volunteers, and to pay the full salaries of 7 employees and partially pay the salaries of 3 employees.

B. AmeriCorps National Reduction in Force

13. It is my understanding that on April 15, 2025, individual members of the AmeriCorps National Civilian Community Corps (NCCC) program were notified that their service terms would end early. While NJCNCS does not administer NCCC, this significant reduction in NCCC’s activities may impact New Jersey and its communities, where AmeriCorps NCCC has provided critical disaster preparedness, response, and recovery services. For example, AmeriCorps NCCC played a crucial role in New Jersey’s recovery from Hurricane Sandy in November 2012, and NCCC teams were deployed long-term to provide resources in support of New Jersey’s recovery and rebuilding. As we head into hurricane season, the absence of NCCC volunteers may delay future hurricane recovery efforts.

14. I also understand that on April 16, 2025, upwards of 90 percent of AmeriCorps staff were placed on administrative leave, leaving only a few staff in each department.

15. I believe the affected staff include those responsible for administering funds for state-operated programs, including those administered by NJCNCS. This reduction in staff may cause significant delays in processing drawdowns.

16. Any delay in processing will impact NJCNCS, which requires access to its approved funding to pay its staff members and maintain the efficacy of its programs.

C. Grant Terminations

17. On Friday, April 25, 2025, I learned that New Jersey's VGF grant was cancelled. As discussed in Paragraph 11, AmeriCorps National provides VGF grants to state commissions to increase volunteer recruitment and retention and strengthen the capacity of local infrastructure organizations. VGF funds are also used to maintain a volunteer portal that matches volunteers with service opportunities.

18. In federal FY2024, the VGF grant received \$579,360 in funding to NJCNCS. \$500,000 of those funds has been subgranted to 11 agencies. To date, VGF has been reimbursed \$208,631.00. Presently, for the period of January 1, 2025 through March 31, 2025, VGF anticipates being reimbursed an additional \$196,857.05. However, on April 30, when NJCNCS submitted a reimbursement request for that amount, it was notified that additional information would be required before funds could be disbursed. It is unclear when these funds will be paid out.

19. On Saturday, April 26, 2025, I learned that 21 additional FY 2024 grants, totaling \$6,109,705, have been terminated. One of those grants - the Rutgers Parent Mentor Academy - is a competitive grant award, for approximately \$151,147. The remaining 20 terminated grants, outlined below, are awarded using NJCNCS formula funds:

Organization	Project	Federal Funding	Total Members
Zufall Health Center	Zufall Health Center Public Health AmeriCorps	\$269,991	7
Rutgers The State University	Rutgers Camden Public Health AmeriCorps	\$214,627	45
Montclair State University	Montclair State University Healthy Communities Corps	\$731,407	28
Rutgers, The State University	Rutgers, the State University Newark - Parent Mentor Academy	\$151,147	12
Princeton Senior Resource Center	"Third Act: A Purposeful Retirement"	\$84,956	0
New Jersey Department of State	Placeholder NJ Cost Reimbursement	\$1,162,194	0
Zufall Health Center	Zufall Health AmeriCorps	\$189,977	0
American Littoral Society, Inc.	American Littoral Society Inc.	\$84,963	0
The Waterfront Project, Inc.	The Waterfront Project Inc.	\$85,000	0
New Jersey Department of Environmental Protection	NJ Watershed Ambassadors Program	\$475,735	23
Boxwood Learning Center Inc.	Boxwood Learning Center	\$256,291	10
SEL4NJ INC	SEL4NJ INC	\$99,901	0
Jewish Renaissance Foundation	Perth Amboy Healthy Future	\$256,530	13
Rutgers The State University	Rutgers Accelerate and Renew Academy (RARA)	\$85,000	0
NJ Coalition to End Homelessness, a Nonprofit Corporation	Helping Homeless Individuals become Housing Ready	\$404,999	9
Montclair State University	Healthy Communities Corps	\$244,902	13
Rutgers The State University	New Jersey School Food Waste	\$189,000	6
The United Advocacy Group Inc.	United Advocacy Group Inc.	\$436,673	21
Isles, Inc.	Isles, Inc.	\$246,776	12
Sewa International, Inc.	Environmental Stewardship Planning NJ	\$0	0

Organization	Project	Federal Funding	Total Members
St. Paul's Community Development Corporation	St. Paul's CDC-AmeriCorps*State Program	\$349,636	10
	Total	\$6,019,705	209

20. At the direction of the termination notice, NJCNCS issued a stop work order to subgrantees on April 30, 2025. The stop work order notified subgrantees that AmeriCorps has terminated the Department's FY2025 Commission Grant, and directed the subgrantees to stop all work immediately. AmeriCorps members may continue their service activities until May 9, 2025, but after that date, NJCNCS can no longer guarantee their positions. NJCNCS further advised subgrantees that any expenses incurred beyond April 25, 2025 that are not "allowable costs" under the terms of the NJCNCS AmeriCorps Award will not be reimbursed.

21. Like many grants, the NJCNCS formula funds and competitive grants are operated on a reimbursement basis. Subgrantees expend costs, submit reports, and seek reimbursement from NJCNCS. NJCNCS will pay the claim, and then seek reimbursement from the federal government. As of April 28, 2025, subgrantees and NJCNCS have been reimbursed for \$2,244,966.11 in expenses incurred before December 31, 2024.

D. Harms to New Jersey

22. The NJCNCS formula funds and competitive grants fund diverse programs that provide critical support to New Jersey communities. For example, St. Paul's Community Development Corporation (SPCDC) serves the City of Paterson. Members serve homeless and food insecure adults and children through their food pantry, where they prepare, distribute and deliver food to over 2,000 families. Members serve at the homeless shelter to provide food and

lodging services to 150 men. Without this program, over 2,000 families in the City of Paterson will be without these anticipated meals which they rely on and may face food insecurity.

23. Montclair State University Healthy Communities Corps is a program administered by Montclair State University (“MSU”), which is a public state university. During the pandemic it created a statewide COVID Service Corps, that recruited college students to serve in schools and health agencies. One of its partners, the Rutgers Camden School of Nursing (another public university), engaged nursing students in COVID testing and vaccinations. MSU has now been chosen to lead New Jersey’s Youth Mental Health Corps, and has planned to recruit, train and deploy 75 AmeriCorps members statewide to meet the needs of young people experiencing depression, loneliness, and behavioral health issues. MSU plans to partner with the Department of Children and Families, Department of Health, Office of the Public Defender, Department of Human Services/Mental Health and Addiction Services to deploy the 75 members to meet critical needs, supervised by clinicians. The proposal offers a range of services including mental health first aid, crisis intervention, relapse prevention, drug and substance use recovery, mental health intakes and interviews, and harm reduction initiatives. The MSU proposal provides a pathway to careers in mental and community health, which is greatly needed in New Jersey. The termination of the MSU program, as well as the 20 other subgrants, undermines the NJNCNS’s discretion regarding the needs of New Jersey, and the Commission is entitled to exercise that discretion, independent of the input of the federal executive branch. Without this program, people with mental health and substance abuse issues in critical need will be left without these vital services.

24. Additionally, as mentioned in Paragraph 9, the New Jersey Watershed Ambassadors Program is administered by NJDEP using formula funds. In light of the termination, NJDEP will no longer be able to place 23 AmeriCorps members at assigned Watershed service

sites. As the most densely populated state in the nation, New Jersey's waters are a valuable and vulnerable resource susceptible to human impact. As such, their protection is augmented by the AmeriCorps Ambassadors who for the past twenty-five years have worked with local communities to channel awareness into action to protect critical water supplies.

25. Similarly, VGF subgrantees include organizations such as the United Way of Hunterdon County, New Jersey Campus Compact (Engage NJ), and Mercer Street Friends, serving a broad demographic across 21 counties. For example, over 1,000 volunteers are deployed through The United Way of Greater Mercer County's volunteer engagement program. An annual highlight is their Strike Out Hunger initiative partnering with corporate volunteers. Strike Out Hunger provides meals, fresh produce, and non-perishables to the food bank and food pantry beneficiaries. To date Strike Out Hunger has 806,000+ Meals Packed; 181,000+ Total Pounds of Fresh Produce Distributed; 12,000 Pounds of non-perishable foods collected; 3000 Volunteers; and 430 Food Pantry Home Deliveries. The programs which rely on the VGF subgrantees for volunteers will lose this valuable source of volunteer generation and recruitment.

26. New Jersey AmeriCorps members, whether serving part- or full-time, receive a living allowance. Currently, out of the 315 members in NJDOS's active AmeriCorps portfolio there are approximately 207 AmeriCorps members serving in the terminated grant projects. At least 87 of those members serve AmeriCorps full time. AmeriCorps members depend on their educational awards to pursue higher education opportunities and since 1994, New Jersey members have earned \$107.3 million in Segal Education Awards. Once terminated these 207 members will no longer receive their living allowance, and in New Jersey these members will not be eligible for unemployment benefits, family leave, or disability benefits. The loss of these members will disrupt the critical projects they serve and the overall welfare of the state.

27. NJCNCS has administered New Jersey's AmeriCorps funding for 31 years. NJCNCS's funding has been renewed year-over-year without interruption. In that time, NJCNCS has hosted over 15,000 members, and have provided services to over 6,000 beneficiaries annually or 186,000 over the life of the State program. Programs have expressed their concerns that these terminations will severely reduce their ability to recruit in the future. Most AmeriCorps members learn of these opportunities through their communities and colleges and word-of-mouth. This abrupt termination is not only a deeply felt personal loss, but also will inhibit their sharing their service experience with others who may express interest in future AmeriCorps initiatives.

28. AmeriCorps programs in both urban and rural areas provide a range of summer projects to educate and keep active children and youth. For example, Montclair State University has been recruiting for its summer program and has 35 members set to start on June 13, 2025. Also, the State Commission is in the final stages of its Formula category grant application review. The Reader Panel has completed its review and the Commission Board is scheduled to vote on the package on May 14, 2025.

29. AmeriCorps programs provide a lifeline for communities across New Jersey. Terminating these programs will not only disrupt services to schools, food banks, shelters, and other critical community outlets, but will also adversely affect the AmeriCorps members and seniors who rely on timely engagement and support. The ripple effect of these delays and terminations will undermine community resilience and erode the trust and benefits built over years of service collaboration.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on May 5, 2025, at Trenton, New Jersey

A handwritten signature in cursive script, reading "Rowena Madden", written in black ink.

Rowena Madden
Director, Governor's Office of
Volunteerism.
Executive Director, New Jersey
Commission on National and
Community Service.